THE BERMUDA
CHAMBER OF COMMERCE

How Many Pieces of Legislation to Verify $3 a Week?

A Chamber position paper on the concerns of regulatory overreach in Bermuda

Issued by the Bermuda Chamber of Commerce, September 2026.

> **The Chamber's position, on the record:**
>
> *"Government should ensure its role in the economy is one that creates a strong eco-system that supports positive growth and benefits to the wider residents. However, its role is not to micromanage the economy."*
>
> *- Bermuda Chamber of Commerce, response to the 2024 Throne Speech (November 2024)*

The Bermuda Chamber of Commerce has been actively monitoring and participating in various legislative measures that the Government has been pursuing. Its immediate concern is the Cost-of-Living Commission Amendment (No. 2) Bill 2026, now before the Senate for its third reading. **The concerns it highlights are not confined to that Bill**: it extends to the parallel Ministerial-override proposals now advancing across banking and electricity regulation, and to the sequence of amendments and regulations that has been advanced under the Cost-of-Living Commission Act 1974 itself in the past twelve months.

On the Minister of Home Affairs' own House-floor arithmetic of 17 July 2026, the grocery duty relief the Bill exists to verify amounts to **$4.6 million a year** on approximately $50.7 million of grocery imports. Spread across approximately 30,000 Bermudian households, **that is on the order of $150 per household per year** - **roughly $3 per household per week**. Duty relief in that range is welcome; any amount that leaves the household is meaningful.

The question this paper puts before the reader is why the Government has advanced or supported **four legislative and regulatory instruments** under the Cost-of-Living Act alone in the past six months, alongside the parallel Ministerial-override proposals under the Bank Fee Regulations consultation and the Electricity Amendment Act 2026, all in the name of verify a $3 per week pass through.

The Chamber's position is that this direction of regulatory design is **not proportionate** to the household benefit it advertises, is not consistent with the Chamber's stated position of November 2024 nor with the Ministry's own statements at the June 2025 Cost of Living Summit, and - on the primary evidence set out in this paper - is **unlikely to reduce what Bermudian families pay at the register**. What follows sets out the pattern, the case study of the Cost-of-Living Bill within it, and the Chamber's continuing position on the direction.

The Pattern of Regulation

In the past six months, four separate legislative and regulatory instruments have been advanced by or under the Cost-of-Living Commission Act 1974:

- **Cost of Living Commission Amendment (No. 1) Act 2026 -** introduced by the Premier as "**housekeeping**" amendments to sections 10A, 10B, 10C and 10E of the Cost-of-Living Commission Act 1974, to provide the statutory basis (vires) for regulations enabling a public price-comparison tool (27 March 2026).

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- **The Cost of Living (Essential Commodities) Amended Regulations 2026 -** issued in reliance on the newly-amended vires, expanding the categories of information the Commission may require, beyond the publicly displayed shelf prices the Premier described to the House on 27 March 2026. Made without further Parliamentary vote or public consultation.
- **Doubling of the essential-commodities list -** on 8 May 2026, the schedule of essential commodities under the Cost of Living (Essential Commodities) Amended Regulations 2026 was doubled by regulation, by negative resolution, with no Parliamentary vote and no impact assessment nor consultation.
- **Cost of Living Commission Amendment (No. 2) Bill 2026 -** compulsory monthly cost filings on grocers, Ministerial power to disallow price movements, tabled 10 July 2026, passed by the House on 17 July 2026 (a seven-day window). This now rest before the Senate for the Third Reading and final vote.

Alongside these, two further Ministerial-override proposals have been advanced by the Government in the same six-month window, both with concerning approaches and language that risk far more harm than good:

- **Bank Fee Regulations consultation (BMA, August 2026) -** specified bank fees (initially over-the-limit and account-maintenance charges, extensible by the Minister) cannot be introduced or increased without a Ministerial no-objection notice within 45 business days, layered on top of the BMA's existing reasonableness review. **The Chamber is not aware of a developed-jurisdiction peer that layers a ministerial no-objection over a prudential regulator's reasonableness review. It is difficult to reconcile with the BMA's statutory mandate that such a proposal has been advanced to public consultation.**
- **Electricity Amendment Act 2026 -** section 13A creates a Ministerial "*public interest*" order that the Act itself specifies is not a direction under the Regulatory Authority Act 2011. **The suspension order gazetted under this provision was issued in support of a Government energy policy that has not been publicly released to date.** The Regulatory Authority has joined BELCO in the Supreme Court on the matter.

What the Cost-of-Living Bill Actually Does

At a glance: Compulsory monthly cost filings on grocers, a 5% same-year price-movement trigger, a 30-day standstill during which the Commission may disallow or modify the movement, an expandable scope, and Ministerial "critical services" declaration authority.

The Bill's public case is Price Transparency. The Bill's substantive mechanism is something else. In statutory English, the Bill:

- Introduces **Cost Disclosure**, not **Price Transparency**. Compulsory monthly filings of cost data - landed cost, freight, duties, wholesale margin, mark-up -for every essential commodity in scope, from every operator on the scheduled list. Not the shelf price. The composition of the shelf price.
- Establishes a **5 per cent same-year trigger**, **set arbitrarily and without published methodology**. No published analysis explains why 5 per cent is the appropriate level, or how the threshold would interact with ordinary global-commodity price volatility (which the perishable-test data below shows already exceeds it). If the shelf price of any scheduled commodity rises more than 5 per cent within a single fiscal year, the Commission is empowered to intervene before the price movement takes effect, including by **disallowance, postponement or modification** of the movement.
- Imposes a **30-day standstill** once the 5 per cent threshold is scheduled, during which the price movement cannot be implemented while the Commission considers its response.
- Enables the **scope to expand by regulation**. The essential-commodities list has already been doubled once (8 May 2026, negative resolution, no Parliamentary vote). The Bill does not stop this from happening again.

- Permits Ministerial declaration of **"critical services"** - including electricity, telecoms and trucked water — for inclusion under the same disclosure and standstill regime.
- Authorises **compliance monitoring by Consumer Protection Act 1999 inspectors**, designated in writing by the Minister.

Price Transparency vs Price Control

A Bill titled "**Price Transparency**" does not require the mechanisms this Bill introduces. Price Transparency describes the shelf price to the consumer - and that was already law before this Bill was introduced. The following mechanisms would not appear in a Bill focused on Price Transparency:

- **A 5 per cent same-year price-movement trigger** - set arbitrarily, with no published methodology.
- **A 30-day standstill** during which the price movement cannot be implemented.
- **Commission authority to disallow, postpone or modify** any price movement above the trigger.
- **Compulsory monthly cost filings** - landed cost, freight, duties, wholesale margin, mark-up - for every scheduled commodity.
- **Ministerial "critical services" declaration authority** - extending the same regime to electricity, telecoms and trucked water.
- **Compliance monitoring by Consumer Protection Act 1999 inspectors** designated by the Minister.

The Bill contradicts two prior Ministry statements on the Hansard record.

- **On 13 June 2025,** the Minister of Home Affairs, answering a direct question in the House of Assembly from the Shadow Attorney General about the single most important reform the Government anticipated would bring down the cost of living, stated: **"Frankly, the cost of living can come down through stakeholder and Government collaboration. Recognising that Government actually cannot carry this weight alone**" (Official Hansard Report, House of Assembly, 13 June 2025). **On supplementary confirmation, the Minister identified "collaboration with the private sector" as her single answer**. The same Minister tabled the No. 2 Bill thirteen months later.
- **On 27 March 2026**, when introducing the earlier No. 1 Act to the House, **the Premier of Bermuda, in his capacity as Minister of Finance**, stated that the pricing information under the amended framework is "**just the public information of the prices which are displayed on shelves," and expressly assured Members that "there is no desire under these particular provisions to collect any more information outside for the price comparison website that is there.**" The regulations that followed, and the substance of the No. 2 Bill now before the Senate, do exactly the opposite of what was assured to the House.

A Bill genuinely focused on Price Transparency would not include any of the mechanisms above. On the Chamber's reading of the Bill's text, the mechanism introduced is Price Control, presented as Price Transparency. **It is not collaboration; it is compliance.**

On The Minister's Public Analogies

Defending the Bill in public commentary on 2 September 2026, the Minister of Home Affairs offered the analogy that the Bill is comparable to a driver's licence test or paying taxes - an unenjoyed but necessary regulatory measure. **The analogy does not survive contact with the Bill's text.**

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A driver's licence and general taxation are universal state instruments. They apply uniformly to citizens on a published, proportional and rules-based footing. Neither requires a private-sector operator to file the components of its cost structure monthly. Neither gives a Minister authority to override the operator's pricing decisions on a case-by-case basis. And neither is set arbitrarily, without a published methodology, with no impact assessment.

The Bill is sectoral price regulation applied to specific private-sector operators, under a 5 per cent threshold set arbitrarily, backed by Ministerial authority to disallow, postpone or modify retail price decisions. **That is a fundamentally different regulatory instrument from a driver's licence or a tax.** And Price Transparency - the standard the Minister invokes as justification - was already law in Bermuda under section 10A of the 1974 Act, in force since June 2022. The Bill does not add Price Transparency. It adds Cost Disclosure with Ministerial price-override authority.

The Perishable Test

The Bill's 5 per cent trigger is not hypothetical. On the Government's own most recent Consumer Price Index (Department of Statistics, March 2026 report, published 17 August 2026), several food subcategories a Bermudian household buys weekly are already moving well above 5 per cent year-on-year:

- **Meats & Meat Products:** index 130.4 (March 2025) to 144.0 (March 2026)- **+10.4 per cent year-on-year.**
- **Poultry:** index 120.7 to 131.7 over the same period -**+9.1 per cent year-on-year.**
- **Fish:** +1.7 per cent year-on-year (below the trigger, but ordinary global movement).

These are not Bermuda-specific movements. They are ordinary global protein-market inflation- the same import cost pressure the Bermuda CPI has tracked against the US CPI for the past decade. Under the Bill's mechanism, both Meats and Poultry would already have triggered the 5 per cent standstill provision, and the Commission would already have authority to disallow, postpone or modify the movement.

Fresh product cannot be held in a 30-day pricing standstill; it perishes. Under the Bill's mechanism, the regulatory response to ordinary global food-cost pressure is that the perishable lines a Bermudian household actually buys - fresh meat, poultry, fish - become the riskiest inventory for a Bermudian grocer to stock.

That is the opposite of what a Bill titled "Cost of Living" is supposed to achieve. It is **the direct consumer-harm mechanism** the Chamber has warned against since the Bill was first tabled.

Shelf-price Winners and Losers

The Bermuda Department of Statistics publishes a monthly survey of 22 grocery items as part of the Consumer Price Index, item by item. The five largest reductions and the five largest increases, January 2023 to March 2026:

Largest reductions (winners)	Largest increases (losers)
Lettuce, Iceberg **-38%**	Icing Sugar **+96%**
Eggs (Local & Imported) **-22%**	Instant Coffee **+38%**
Corn Flakes **-17%**	Tea bags **+22%**
Tomatoes (Imported) **-16%**	Spareribs (Pork) **+17%**
Converted Rice **-16%**	Green Peppers **+16%**

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The pattern is consistent: staples subject to duty relief have moved down; items driven by global commodity prices or by existing Bermuda duty have moved up. Sugar carries a 75 per cent ad valorem duty in place since 2019 - the duty the Chamber has repeatedly recommended the Ministry of Finance review. The full 22-item series is reproduced in Appendix A at the end of this paper.

- **Fuel at the pump:** +2%. Regulatory Authority Fuel Adjustment Rate: −1%. Where independent regulation is in place, pass-through is already documented - without compulsory monthly cost filings.
- **Volatility is the point.** Some items swing 10–20 per cent within a year on global commodity cycles; others step down cleanly when duty relief is applied. A Bill that polices monthly cost filings does not address either dynamic.

What This Paper Does Not Dispute

Before turning to the Chamber's alternatives, it is worth being explicit about the shared ground. On the record, the Chamber accepts:

- **Food is expensive in Bermuda.** The pressure on the household food basket is real, and it is not disputed.
- **The $4.6 million of grocery duty relief is welcome.** Any amount that leaves the household matters. The Chamber has supported it.
- **A working public price comparison tool is welcome.** The Chamber has proposed and supported this instrument since 2023, and the Ministry has now stated it is "in build."
- **A grocery code of conduct under an independent competition authority is welcome - but it is not the same instrument as the Bill.** The Ministry has framed such a code as broadly equivalent to what No. 2 introduces; it is not. A code of conduct operating under an independent competition regulator is a fundamentally different regulatory design from compulsory cost disclosure with Ministerial power to disallow retail price movements. The Chamber has proposed the code and will file it into the Competition Act 2026 consultation as invited.

The Chamber's dispute with the Bill is not the existence of a cost-of-living problem in Bermuda. It is the instrument: **prior approval, cost-file standstill, and Ministerial override of retail price movements** will not reduce what the household pays and carries a real risk of the opposite outcome.

The Five Principles Test

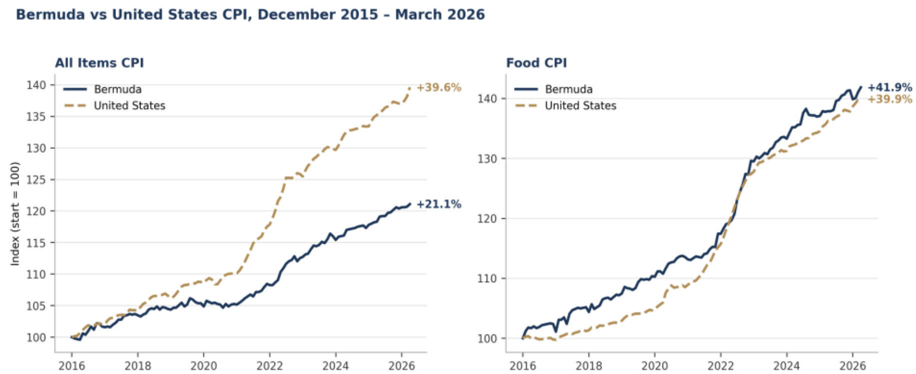
On 7 November 2025, the Minister of Home Affairs, the Honourable Alexa Lightbourne, MP, delivered a Statement to the House of Assembly on the Affordable Bermuda Agenda. The Statement identified five guiding principles for cost-of-living reform. In the Minister's own words:

> *"The Affordable Bermuda Agenda is anchored in five guiding principles:"*
>
> *"1. Decisions must be evidence-based. 2. Transparency and public accountability must be the norm. 3. Fairness must reach households and businesses. 4. Reforms must be sustainable over the long term. 5. And finally, responsibility must be shared across government, industry, and community.*
>
> *- Minister of Home Affairs, House of Assembly, 7 November 2025 (Official Hansard Report)*

The Bill before the Senate does not deliver any of the five.

- **1. Evidence-based.** The Bill's 5 per cent same-year price-movement trigger was set arbitrarily. No published methodology explains why 5 per cent is the appropriate level, or how the threshold would interact with ordinary global-commodity price volatility. The Government's own March 2026 CPI already shows Meats +10.4 per cent and Poultry +9.1 per cent year-on-year - direct evidence the threshold is operationally unworkable on the very categories the Bill is meant to regulate.

The empirical case against the Bill's diagnosis. The broader record over the past decade tells the same story on a wider canvas. On the Government's own CPI (indexed December 2015 = 100), Bermuda Food inflation was **+41.9 per cent** through March 2026; US Food inflation was **+39.9 per cent** over the same period -a two-percentage-point gap across a full decade. Bermuda food inflation tracks the country from which it imports most of its groceries. **Food inflation in Bermuda is a global import-cost phenomenon, not a Bermuda-specific competition failure requiring compulsory cost disclosure. A Bill built on the wrong diagnosis will not lower the price level.**



Sources: Bermuda Department of Statistics, CPI All Items and Food components. US BLS, CPI-U All Items (CPIAUCNS) and CPI-U Food (CPIUFDNS), NSA. Indexed to December 2015 = 100. Data through March 2026.

- **2. Transparency and public accountability.** The essential-commodities list was doubled by regulation on 8 May 2026 under negative resolution, with no Parliamentary vote and no impact assessment. The amending regulations to BR 125/2022 issued in reliance on the newly amended vires expanded the categories of information the Commission may require, without further Parliamentary vote. Neither instrument was transparent; neither was publicly accountable.
- **3. Fairness reaching households and businesses.** The Bill's mechanism produces two consumer-harm outcomes. Fresh perishable inventory -fresh meat, poultry, fish, the products a Bermudian household actually buys - becomes the riskiest stock for a Bermudian grocer to carry. Higher opening prices follow as the second-round response to the trigger. The burden falls ultimately on the household through both narrower availability and higher shelf prices.
- **4. Sustainable over the long term.** A 30-day pricing standstill on ordinary global-commodity movements is not sustainable. Fresh product perishes inside that window. A regulatory mechanism that designs perishable inventory into being a stocking liability cannot be sustained operationally or politically.
- **5. Shared responsibility across government, industry, and community.** Compulsory monthly cost filings from grocers, backed by Consumer Protection Act 1999 inspectors designated in writing by the Minister, is not shared responsibility. It is unilateral compulsion. Where the Minister herself, on 13 June 2025, identified collaboration with the private sector as the single most important reform to bring down the cost of living in Bermuda, the Bill introduces the opposite architecture.

On the record, the Bill fails each of the five principles the Minister of Home Affairs articulated for the Affordable Bermuda Agenda. The six substantive measures the Chamber would support - set out in the section that follows -are designed to implement each of these five principles as the Minister herself articulated them.

What The Chamber Would Support

The Chamber's position is not "no." It is that this Bill will not deliver cost-of-living relief, and that **six substantive measures will**. They are the same six the Chamber has been publishing on the record since the August 2026 paper. Each is directly **reduce-price, not verify-price**. Each targets a cost pass-through the Government controls. Any of the six could be delivered before the end of the current fiscal year.

The Chamber notes that the six measures below are precisely the form of stakeholder-Government collaboration the Minister of Home Affairs identified on 13 June 2025 as the single most important reform to bring down the cost of living in Bermuda.

- **Independent walk-through of duty pass-through.** Not a Ministry-appointed Commission; a periodic independent walk-through of a randomly selected shipment to verify that duty relief already granted has reached the shelf. Publicly reported. No cost-disclosure regime required.
- **Freight-cost offset funded by sin-tax receipts.** Direct freight-cost subsidy on essential-commodity imports, offsetting the small-market scale disadvantage that raises the price level for every Bermudian household. Funded from tobacco and liquor duty receipts.
- **Sugar duty review.** The 75 per cent ad valorem duty on sugar has been in place since 2019 - the largest single ad valorem burden on any staple in the current DoS 22-item survey. Reviewing it delivers pass-through relief directly, without a compliance regime.
- **Deliver the price-comparison aggregator.** On 24 June 2020, the Government told the Senate the software changes required to build this tool would "*not be in excess of $50,000*" (Official Hansard Report, Senate, 24 June 2020, p. 986). More than five years later, the Ministry has stated it is "in build." It can be built off existing private-sector feeds -pronto.bm, dropit.bm, shop.miles.bm, marketplace.bm - as the Chamber has proposed since 2023. No new coercive powers are required.
- **Post-hoc inquiry, not prior approval.** If a commodity price rises materially above the average import cost, empower the Commission to inquire retrospectively- not to authorize or prevent movements prospectively. Preserves the market signal while providing accountability.
- **Grocery code of conduct under the Competition Act 2026.** The exact instrument that operates in the UK, New Zealand and Australia, administered by the same independent competition regulators the Ministry has cited. The Chamber will submit its proposed code to the Competition Act consultation as invited by the Ministry's 3 September response.

Each of these six measures can be delivered voluntarily by industry or within the current statutory framework. None requires additional coercive powers, and none requires the direction of regulatory design set out in the Bill. Over-regulation of the private sector will not reduce the cost of living or the cost of doing business in Bermuda.

These six measures reduce the price level Bermudian households actually pay. The Bill before the Senate does not.

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A Call To The Senate

The Chamber respectfully calls on the Senators of Bermuda - Government, Opposition and Independent -to reject the Cost-of-Living Commission Amendment (No. 2) Bill 2026 in its current form. The Bill's name points to cost of living; its mechanisms do not.

On the primary evidence set out in this paper -the seven fact-checks the Chamber has published, the Government's own CPI, and the Premier's own words on the introduction of No. 1 that the original amendment was for the collection of publicly displayed shelf prices - while the subsequent regulations reached far beyond - the Bill is unlikely to reduce what a Bermudian household pays at the register, and carries a real risk of the opposite outcome: availability contracts first, as perishables cannot sit in a 30-day standstill, and higher opening prices follow as the second-round response to the trigger, with the burden falling ultimately on the household.

The Chamber has supported, and will continue to support, meaningful dialogue with the Government on the substantive measures that will reduce the cost of living in Bermuda in a means that supports the broader economy and does not negatively impact consumers and businesses alike.

Supporting Evidence

What follows is the primary-source evidence and analytical detail behind the Senate briefing above: the seven fact-checks the Chamber published in August 2026, the Government's own CPI data, the precedent set by the No. 1 Act as "housekeeping," and the wider analytical observation on why grocery, banking and electricity are appearing in the same direction simultaneously.

Each of these has been advanced in isolation, with its own stated justification and its own consultation timetable. Taken together, they describe a direction: the retention of independent statutory bodies on the letterhead of Bermuda's regulatory framework, alongside the relocation of decisive authority to the Minister after the specialist body has done its work.

Applied simultaneously across grocery, banking and electricity, the effects compound rather than divide. **A household does not experience three separate policy episodes; it experiences one cumulative pressure across the daily basket, the monthly bank statement, and the utility bill.**

There is one further observation on why grocery, banking and electricity are appearing in the same direction simultaneously: the household cost in each is visible and attributable to a private-sector operator. Shelf prices are published weekly; bank fees appear on monthly statements; electricity bills arrive at the door.

Other cost drivers on Bermudian households - freight, duty stock, rent-control policy on non-controlled properties, the 75 per cent sugar duty in place since 2019 -sit with Government or in the broader economy and are less visible to the household.

Where household cost is visible and attributable to a private operator, the direction of regulatory design has moved to Ministerial oversight. Where household cost sits with Government, it has not.

This is **not the settled model in developed and mature jurisdictions**. Independent regulators exist because direct political pricing of private transactions distorts supply signals and contracts investment in the very sectors it targets - an outcome **sharper, not milder**, in a small, import-dependent economy such as Bermuda's.

The seven fact-checks- AS FRAMED, ACTUAL

The August paper set out seven public framings and put the primary evidence next to each. The framings and the primary evidence are reproduced below in the same AS FRAMED / ACTUAL structure the Chamber has used since August.

1. AS FRAMED: *The Bill delivers Price Transparency.*

ACTUAL: Price Transparency was already law under section 10A of the 1974 Act (in force since June 2022) and Regulation 8 of BR 125/2022 (weekly publication, in force since November 2022). What the Bill adds is **Cost Disclosure** - visibility into supply-chain components behind the shelf price. Different regulatory instrument entirely.

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2. AS FRAMED: The *Bill enables the delivery of $40 million in cost-of-living relief.*

ACTUAL: The specific grocery-relevant duty relief the Bill's mechanism policies is $4.6 million a year on $50.7 million of grocery imports (Minister of Home Affairs, House-floor figure, 17 July 2026). Across approximately 30,000 Bermudian households, that is on the order of $150 per household per year - roughly $3 per household per week.

3. AS FRAMED: *The Bill's approach follows the international comparators.*

ACTUAL: The comparators the Ministry cites - the United Kingdom, New Zealand and Australia - operate grocery and supplier codes administered by **independent competition regulators**. That is the exact instrument the Chamber has proposed for the Competition Act 2026 consultation. None supports what No. 2 introduces. Jamaica compels nothing from retailers. The Bahamas is a cautionary case the Inter-American Development Bank warned against in 2022.

4. AS FRAMED: *Retailer non-compliance is why cost-disclosure powers are needed.*

ACTUAL: The Commission's own statutory duties - public essential-commodity price database (s.10A, in force 17 June 2022) and weekly publication (Regulation 8, in force 18 November 2022)- have not been delivered. Retailer shelf prices are already published in real time by the private sector at pronto.bm, dropit.bm, shop.miles.bm and marketplace.bm.

5. AS FRAMED: *The Bill implements a consistent legislative framework.*

ACTUAL: For six years - through 2020, 2025, and as recently as 27 March 2026 -the framework was described in terms that would exclude what No. 2 introduces. The Government's position on scope changed only after 8 May 2026, when the essential-commodities list was doubled by regulation with no Parliamentary vote.

6. AS FRAMED: *Industry has been meaningfully consulted on the Bill.*

ACTUAL: The essential-commodities list was doubled by regulation before the one industry meeting took place. The Bill's substantive text was seen by industry only days before House passage on 17 July 2026. Seven days from tabling to House passage. No impact assessment was produced.

7. AS FRAMED: *Bermuda food inflation is a Bermuda-specific problem.*

ACTUAL: Between December 2015 and March 2026, Bermuda food inflation was +41.9 per cent, US food inflation +39.9 per cent - a two-percentage-point gap across a full decade. Bermuda tracks the country from which it imports most of its groceries. That is a global import-cost story, not a Bermuda competition-failure story.

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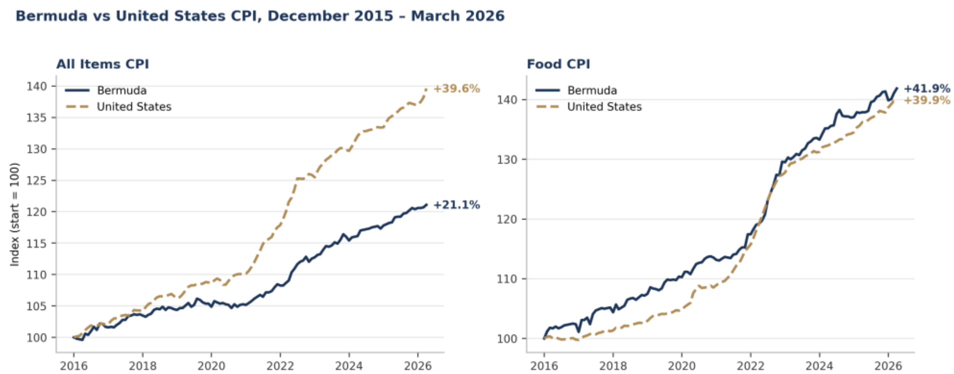
What the Government's own Consumer Price Index shows

Three findings from the Government's own Consumer Price Index - the measure the Government uses to characterize headline inflation - close the empirical loop on the Bill's public case.

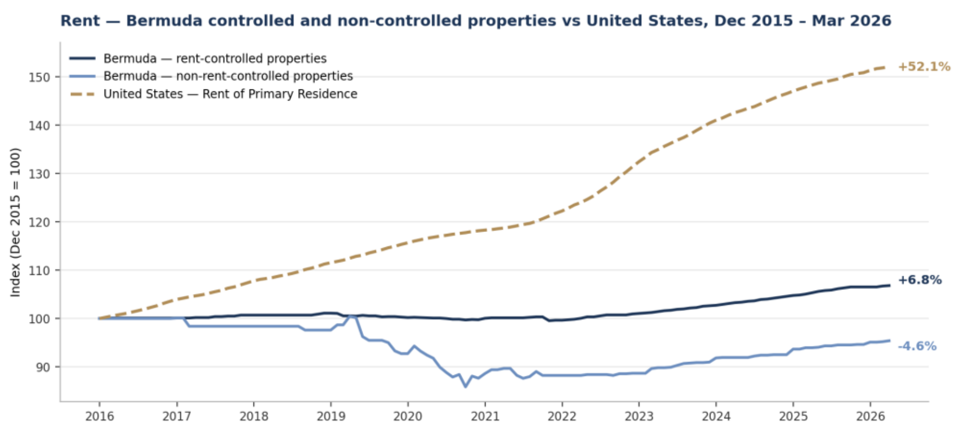
Finding 1: Bermuda food inflation tracks the United States, almost exactly.



Sources: Bermuda Department of Statistics, CPI All Items and Food components. US BLS, CPI-U All Items (CPIAUCNS) and CPI-U Food (CPIUFDNS), NSA. Indexed to December 2015 = 100. Data through March 2026.

- **Bermuda Food: +41.9%.** US Food: **+39.9%.** A gap of 2 percentage points across a decade. Bermuda tracked the country from which it imports most of its groceries.
- **Bermuda All Items: +21.1%.** US All Items: **+39.6%.** Bermuda's headline inflation ran ***well below*** the United States.

Finding 2: The reason food outran overall inflation in Bermuda -rent.



Sources: Bermuda Department of Statistics, CPI Rent division sub-indices (rent-controlled, non-rent-controlled). US BLS, CPI-U Rent of Primary Residence (CUUR0000SEHA, NSA). Rent Increases (Domestic Premises) Control Act 1978. Indexed to December 2015 = 100.

- **US rent: +52.1%.** Bermuda rent-controlled: **+6.8%.** Bermuda non-rent-controlled: **−4.6%.**
- **Rent accounts for 26.7 per cent of the overall CPI.** One series suppresses the headline number. The "more than double" framing on food inflation is a Bermuda CPI composition effect, not a grocery-sector diagnosis.

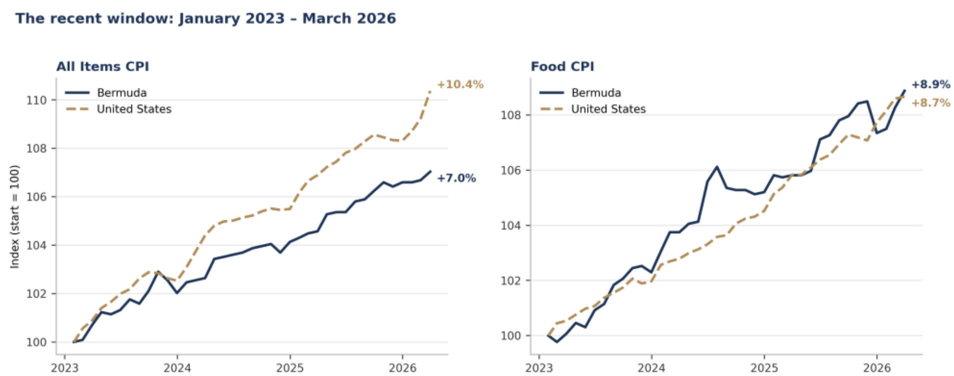
The Government's own most recent CPI report on rent

The Chamber notes the divergence between the Department of Statistics CPI Rental Index and the political framing the Government uses to describe rental affordability. According to the March 2026 CPI report, published by the Department of Statistics on 17 August 2026, Bermuda's non-controlled rental properties index stood at 99.3 in March 2026 - below its April 2015 baseline of 100 more than a decade earlier. The report showed overall Rent up 7.8 per cent from that baseline, on a series that accounts for 26.7 per cent of the overall CPI.

> *"The Government's own most recent CPI report shows non-rent-controlled rents in Bermuda below their April 2015 level. The Government's own political framing says rental affordability is a live cost-of-living crisis. Both cannot be the case at once, and the Chamber is not the party best positioned to reconcile them."*

The Chamber is not claiming that rents in Bermuda are affordable. The Chamber is noting that the same CPI Rental Index the Government uses to characterise headline inflation does not, on its own numbers, support a "more than double" framing of food inflation as a grocery-sector diagnosis.

Finding 3: Even over the most recent window, the pattern holds.



Sources as above. Indexed to January 2023 = 100.

- **Bermuda Food: +8.9%.** US Food: **+8.7%.** Essentially level over the more recent window.

None of this makes food prices in Bermuda affordable. It shows that the rate of increase, on the Government's own measure, is consistent with global food-cost pressure, not with a Bermuda-specific competition failure. The high price level itself reflects structural realities the Bill does not address - freight-cost pass-through on an economy that imports more than 90 per cent of its consumer goods, small-market-scale limits, and cumulative duty stock (starting with the 75 per cent sugar duty). A Bill built on the wrong diagnosis will not lower the level.

The precedent - a pattern of Ministerial statements the Bill contradicts

The Bill before the Senate contradicts three prior Ministry statements on the Hansard record, in chronological order: the Minister of Home Affairs on 13 June 2025 identifying stakeholder collaboration as the single most important reform to bring down the cost of living in Bermuda; the same Minister on 7 November 2025 articulating five guiding principles for the Affordable Bermuda Agenda (each of which the Bill fails, as set out in the front-page section "The Bill measured against the Minister's own five guiding principles"); and the Premier of Bermuda on 27 March 2026, in his capacity as Minister of Finance, assuring the House on the introduction of the No. 1 Act that the pricing information under the amended framework was limited to publicly displayed shelf prices. All three are set out below in the order they were made.

The Minister of Home Affairs on collaboration - 13 June 2025

On 13 June 2025, the Minister of Home Affairs, the Honourable Alexa Lightbourne, MP, delivered a Statement to the House on the Government's approach to the cost of living and the June 2025 Cost of Living Summit. In response to a direct on what the Minister considered the single most important reform the Government anticipated would bring down the cost of living in Bermuda, the Minister's response was categorical:

> *"Frankly, the cost of living can come down through stakeholder and Government collaboration. Recognising that Government actually cannot carry this weight alone."*
>
> On supplementary confirmation -"the answer you gave to the one most important reform to bring down the cost of living was collaboration with the private sector?" - the Minister confirmed: *"If I were to list one, yes."*
>
> *- Minister of Home Affairs, House of Assembly, 13 June 2025 (Official Hansard Report)*

The Minister who gave that answer on 13 June 2025 is the same Minister who tabled the No. 2 Bill thirteen months later. The Bill she tabled does not implement stakeholder collaboration; it introduces the compulsory-disclosure and Ministerial-override architecture set out in the front-page section "What the Bill does."

The Minister on the Affordable Bermuda Agenda - 7 November 2025

On 7 November 2025, the same Minister delivered a Statement to the House of Assembly on the Affordable Bermuda Agenda. The Statement identified five guiding principles for cost-of-living reform. The full list is quoted in the front-page section of this paper, where each principle is measured against the Bill's mechanism. On the record, the Bill fails each of the five.

The exchange that followed the Statement is also material when asked what the Minister's intent was, at the end of a nine-month engagement with grocers and wholesalers, to reduce food costs. The Minister's answer, on the record:

> *"Through engagement with the stakeholders, the Ministry has understood the operational expenses, and it is the intention that at the conclusion of the nine-month period we would be able to have evolved policies under legislation relating to lowering the operational cost to then also see that cost savings passed on to the customers."*
>
> *- Minister of Home Affairs, House of Assembly, 7 November 2025 (Official Hansard Report)*

Two features of that answer are notable. First, the Minister framed the future direction as "*lowering the operational cost"* - not disallowing shelf prices, not standstill orders, not Ministerial disallowance authority. Second, the nine-month engagement period the Minister described would have concluded in or around August 2026. The No. 2 Bill was tabled on 10 July 2026 - before the engagement completed. What the Minister described as an operational-cost-reduction framework, delivered through stakeholder engagement, is not what the Bill introduces.

The Premier of Bermuda on the scope of No. 1 -27 March 2026

The Cost-of-Living Commission Amendment (No. 1) Act 2026 was introduced to the House by the Premier of Bermuda, David Burt, in his capacity as Minister of Finance, on 27 March 2026. In his second-reading speech, the Premier characterised the amendments as "*technical amendments to enable the long-promised price comparison tool that will allow Bermudians to compare the retail prices of a selected basket of grocery store items commonly purchased by households." He described the amendments repeatedly as "housekeeping in nature," and closed his introduction by saying they were "minor housekeeping amendments to the principal Act to provide the vires for those regulations to be issued*."

When clarification on scope of the Bill was asked, the Premier's response was categorical. The Premier gave three explicit assurances to the House on the record:

> *"With reference to the comment made by the Honourable Member, I did go ahead and make sure to clarify that the pricing information is just the public information of the prices which are displayed on shelves for the purpose of having a price transparency tool."*
>
> The Premier then continued: *"I can assure the Honourable Member that there is no desire under these particular provisions to collect any more information outside for the price comparison website that is there."*
>
> And to close the point: *"There are other sections of the Cost-of-Living Act that do allow the Minister to make enquiries, or the Cost-of-Living Commission, to make enquiries. But this, in this section, is just for the regulations for the app and the electronic transfer of that particular information. So, I hope that puts those particular matters to rest."*
>
> *-Premier of Bermuda, House of Assembly, 27 March 2026 (Official Hansard Report, pp. 2842–2843)*

The Bill passed the House the same day. What followed was not consistent with what was said.

- **The regulations issued under the amended Act** - without further Parliamentary vote- materially expanded the categories of information the Commission may request, going beyond publicly displayed shelf prices.
- **On 8 May 2026, the essential-commodities list was doubled by regulation** under negative resolution, with no Parliamentary vote and no impact assessment.
- **The Cost-of-Living Commission Amendment (No. 2) Bill 2026** was tabled on 10 July 2026- fifteen weeks after the Premier's Hansard assurances. It introduces compulsory monthly cost filings on grocers, and a Ministerial power to disallow retail price movements. The scope of information required under this Bill is precisely the departure the Premier assured the House would not occur.

The Chamber notes that this sequence has proceeded in parallel with the Government's own stated commitment to collaboration. At the Cost-of-Living Summit convened by the Ministry in June 2025, the outcomes were described by the Ministry as "*a declaration that shared responsibility is essential to meaningful change*." The Chamber welcomes that principle. On this Bill and its predecessors, collaboration in that form has not taken place.

The Chamber's November 2024 position - that the Government's role in the economy is "*not to micromanage the economy*" -was framed precisely to guard against a direction of travel like the one this sequence describes. It has been on the record for two years.

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One final note on the register of the debate. Three opinion columns published in the Royal Gazette on 1, 2 and 3 September 2026 called for expanded price controls and, in the third, for criminal sanctions and imprisonment of directors. That is not the Ministry's position, and the Chamber does not attribute it to the Ministry. The Bill before the Senate should be judged on the $3 a week of duty relief its mechanism policies - not on a penalty register the Ministry has not adopted.

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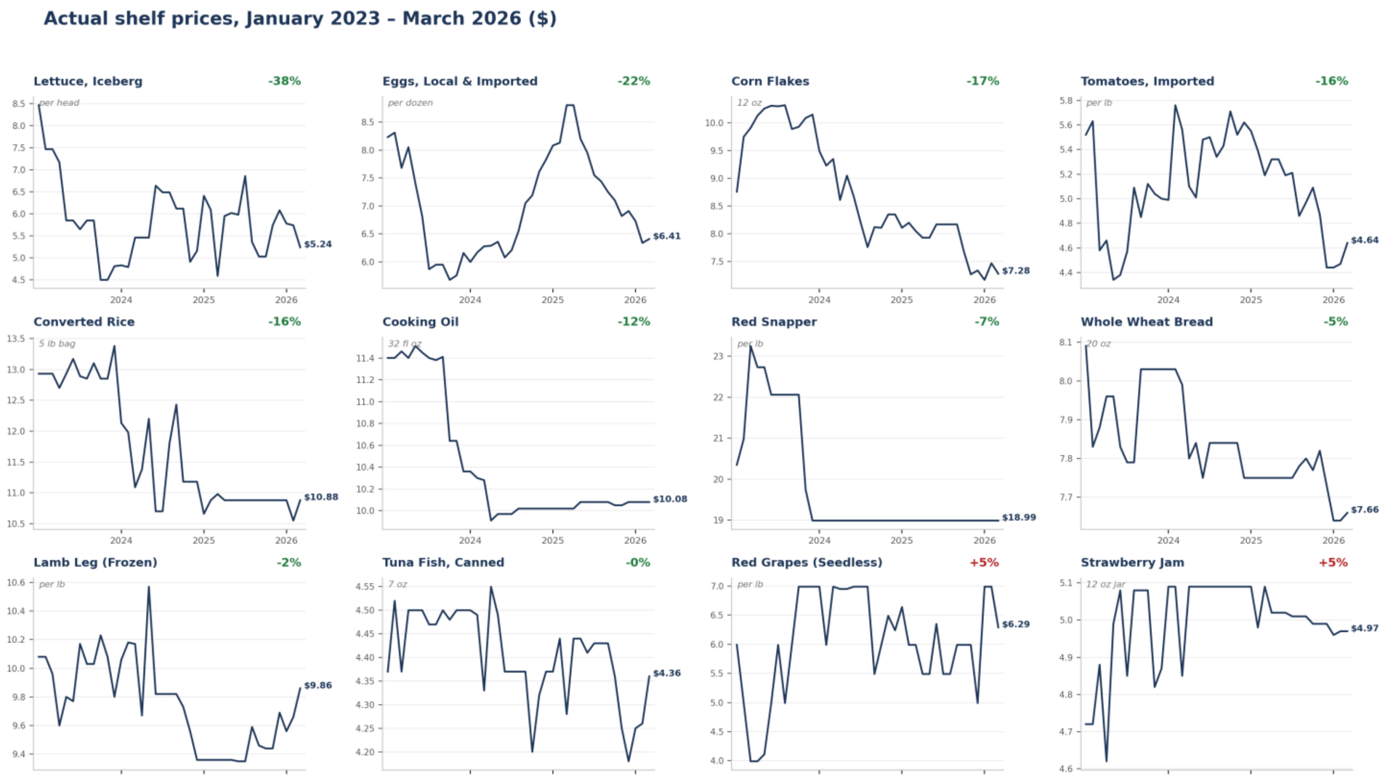
Appendix A · Actual Shelf Prices The Government's Own Monthly Survey

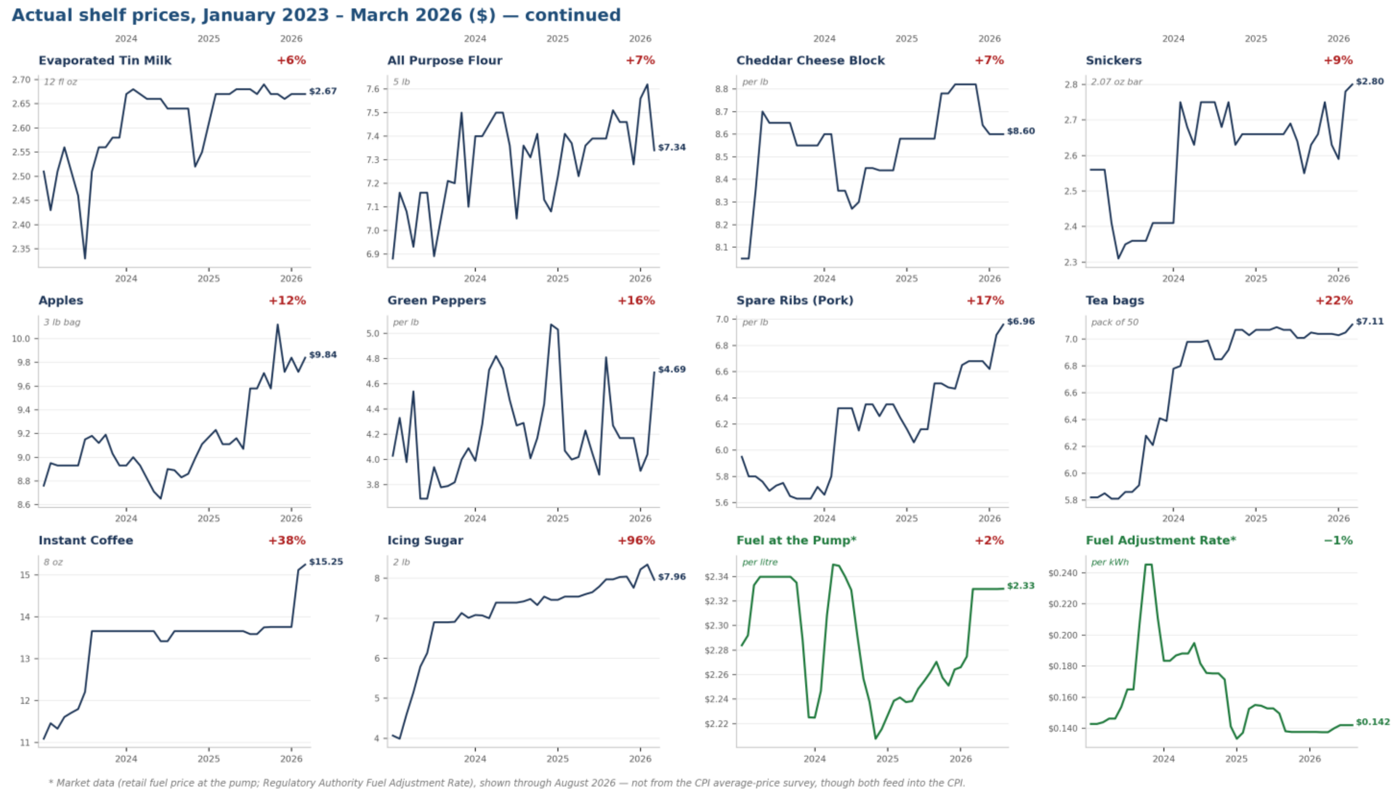
The 22 items in the Bermuda Department of Statistics monthly grocery survey, ordered largest reduction to largest increase, January 2023 to March 2026. Plus two energy series in green: retail fuel at the pump and the Regulatory Authority Fuel Adjustment Rate, shown through August 2026. This is the item-by-item price picture behind the Ministry's statement that families are paying more for food than at any point in the past decade. Split across two pages so the volatility of each item is visible.



Part 1 of 2 — items with the largest reductions or most modest changes. Sources: Bermuda Department of Statistics, Consumer Price Index, Average Prices of Selected Items (monthly releases). Percentage change January 2023 to March 2026.

Appendix A (continued) · Actual Shelf Prices - Part 2

Items with modest to largest sustained increases (evaporated milk through icing sugar), plus two energy series in green: retail fuel at the pump and the Regulatory Authority Fuel Adjustment Rate, shown through August 2026.



Part 2 of 2 — items with modest to largest sustained increases (grocery items in navy) plus two market-data energy series in green (retail fuel price and Regulatory Authority Fuel Adjustment Rate). Fuel series shown through August 2026.